

Amity Planning Consultants
Creative Quarter 8A
Morgan Arcade
Cardiff
United Kingdom
CF10 1AF

Date: 07/01/2025
Our Ref: PPA0009149

Dear Sir/Madam

Grid Ref: 270329 210590
Site Address: Former Swelco Factory, West of Heol Y Gors Cwmgors
Development: Article 2D - Proposed development

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

Firstly, we note that the proposal relates to the 45 residential dwellings, and acknowledge the site comprises of a potential windfall development with no allocated status in the Local Development Plan (LDP). Accordingly, whilst it does not appear an assessment has been previously undertaken of the public sewerage system, we offer the following comments as part of our appraisal of this development.

Public Sewerage Network

The proposed development site is located in the immediate vicinity of a foul sewerage system, which drains to Garnswllt Waste water Treatment Works (WwTW).

This site is crossed by a public foul sewer with the approximate position being marked on the attached Statutory Public Sewer Record. In accordance with the Water Industry Act 1991, Dwr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. However, having regard to Drawing No (02)100 Rev E, it appears the proposed development would be situated outside the protection zone of the public sewer measured 3 metres either side of the centreline and therefore acceptable in principle. Please note, the distance specified for this protection zone is indicative and based on industry standard guidelines. However, the depth of the asset will need to be verified on

site which may infer a greater protection zone. For completeness, we recommend the developer refer to their title deeds to confirm if there are any covenants or restrictions associated with the asset(s) crossing the proposed development site.

Accordingly, it is recommended that the developer contact our Plan and Protect team (PlanandProtect@dwrcymru.com) to carry out a survey to verify the location of this asset and establish its relationship to the proposed development, which should be referred to in the [Drawing], for the purposes of any forthcoming planning application. Further information regarding Asset Protection is provided in the attached Advice & Guidance note as well as our Developer Services website, which offers guidance on building SuDS features over or near to our assets at <https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems>.

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times

Surface Water Drainage

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy preferring infiltration (PL2) and, where infiltration is not possible, disposal to a surface water body (PL3), in liaison with the Lead Local Flood Authority and/or Natural Resources Wales, or surface water sewer or highway drain (PL4) in liaison with the riparian owner and/or Local Highways Authority. Please be advised that due to capacity constraints with the downstream public sewerage network, under no circumstances would we allow surface water runoff highway run-off from the proposed development to communicate directly or indirectly with the public combined sewerage system. Please note, no amount of land drainage run-off is permitted to discharge directly or indirectly into the public sewerage system.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
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We welcome correspondence in
Welsh and English

Dwr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dwr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Furthermore, Planning Policy Wales (PPW) acknowledges that discharge of surface water to foul sewers is prohibited and highlights that any additional surface water from new developments should not be discharged to combined systems because of the risk of pollution when combined systems overflow (Para 6.6.3). Moreover, PPW recognises the challenges faced from rainfall intensity causing surface water flooding and diffuse pollution (Para 6.6.14) along with the importance of well-maintained sewerage networks (Para 6.6.15), particularly as a result of run-off from built surfaces and the sewage discharges from overloaded sewers (Para 6.6.16).

It is therefore recommended that the developer consult with Neath Port Talbot County Council as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, DCWW is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation. Please refer to further detailed advice relating to surface water management included in our attached Advice & Guidance note and our Developer Services website at <https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems>.

Foul Water Drainage – Sewerage Network

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the 225mm foul sewer located in Heol y Gors.

Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account. However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.

You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water Industry Act 1991. However, if the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Foul Sewers and Lateral Drains and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.



SEWAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

WATER SUPPLY

Capacity is currently available in the water supply system to accommodate the development. Initial indications are that a connection can be made from the 6" diameter CI watermain in 270418, 210652 location. We reserve the right however to reassess our position as part of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Rhys Evans
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



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